

**UNITED STATES DISTRICT COURT
WESTERN DISTRICT OF MICHIGAN**

SARAH,

Plaintiff,

v.

GOOGLE LLC, YOUTUBE LLC,
JAMES JACKSON, also known online as
“ONISION,” and LUCAS JACKSON,
formerly known online as
“LAINEYBOT,” “LAINEY” and “KAI,”

Defendants.

CASE NO. 1:23-CV-00223

HON. HALA Y. JARBOU

**JOINT STIPULATION REQUESTING LEAVE TO FILE
SUPPLEMENTAL AUTHORITY BRIEFS**

COMES NOW, Plaintiff Sarah, Defendant Google LLC, and Defendant YouTube, LLC (collectively “the Parties”), by and through their respective undersigned attorneys, hereby agree and stipulate that good cause exists to request an order from this Court granting leave for each of the parties to file a Notice of Supplemental Authority Brief.

RECITALS

WHEREAS, Plaintiff filed the Complaint in the above-entitled action in the U.S. District Court for the Western District of Michigan on March 2, 2023 (ECF No. 1, PageID.1-67).

WHEREAS, Defendants Google LLC and YouTube LLC’s (“YouTube Defendants”) Corrected Motion to Dismiss Plaintiff’s Complaint (ECF No. 40-41,

PageID.454-483) is currently pending before this Court for decision. The issues have been fully briefed by the parties.

WHEREAS, On August 3, 2023, the United States Court of Appeals for the Seventh Circuit issued its decision in *G.G. v. Salesforce.com, Inc.*, No. 22-2621, 2023 WL 4944015 (7th Cir. Aug. 3, 2023), attached hereto as Exhibit A, which, *inter alia*, addresses Section 230 of the Communications Decency Act and 18 U.S.C. § 1595.

WHEREAS, the Parties have conflicting views about the relevance and applicability of the Seventh Circuit's decision to this case, but agree that supplemental briefing to address the decision would be beneficial.

WHEREAS, the Parties have conferred and agree to a filing and briefing schedule for a Notice of Supplemental Authority Brief to state their views about the implications of *Salesforce* on the matter before the Court.

WHEREAS, Plaintiff's counsel is having surgery on August 30, 2023, and needs a brief recovery time after that date, the Parties have agreed to simultaneously submit five (5) page briefs on or before September 11, 2023.

WHEREAS, granting this request will not prejudice any party, as this will not affect the Case Management Schedule.

NOW, THEREFORE, IT IS HEREBY STIPULATED AND AGREED by the Parties hereto through their undersigned counsel, as follows:

1. Upon the Court granting leave, Plaintiff and the YouTube Defendants would each file a supplemental brief on the limited issue of the *Salesforce* decision and its applicability to the issues of this case.

2. The briefs for each side would be filed on or before September 11, 2023 and will be no more than five (5) pages in length, not including the style of the case, signature block, or certificates of service.

IT IS SO STIPULATED.

DATED: August 28, 2023

/s/ Lisa D. Haba

Lisa D. Haba

THE HABA LAW FIRM, P.A.

Attorney for Plaintiff

DATED: August 28, 2023

/s/ Brian M. Willen

Brian M. Willen

WILSON SONSINI GOODRICH &

ROSATI, P.C.

Attorney for Google LLC and YouTube LLC

ORDER

Plaintiff and The YouTube Defendants are granted leave to file a supplemental brief as stipulated herein.

SO ORDERED,

HON. HALA Y. JARBOU